

EXHIBIT 6-C

Claimant's Responses to Requests for Production of Documents

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

RESIDENTIAL CAPITAL, LLC, et al.,
Post-Effective Date Debtors

Chapter 11

RESCAP BORROWER CLAIMS TRUST,
Objector

Case No. 12-12020-mg

v.

TIA DANIELLE SMITH,
Creditor-Beneficiary

**CLAIMANT TIA SMITH'S INITIAL RESPONSE TO OBJECTOR'S FIRST SET OF
REQUESTS FOR PRODUCTION OF DOCUMENTS**

Tia Danielle Smith, Claimant, by her attorney, Wendy Alison Nora of ACCESS LEGAL SERVICES provides the following preliminary responses to the First Set of Requests for Production of Documents, subject to the objection and reservation herein. By agreement with counsel for Objector, Ms. Smith will be producing responses to these Interrogatories on a rolling basis through December 22, 2015. Objector has been informed that relief from the Scheduling Order forthwith because expert and lay opinion testimony was not anticipated and has not been scheduled.

GENERAL OBJECTIONS

Ms. Smith cannot respond to these Interrogatories using the definitions supplied by Objector because some of the definitions of words and phrases supplied by the Objector would cause any response to the Request containing those words and phrases to be false or misleading. Therefore, Ms. Smith will refer to the definitions of words and phrases she supplied in her written discovery when she substitutes those definitions for those supplied by the Objector.

Most of the evidence and documents Ms. Smith needs to respond to these Requests is in the exclusive control of GMAC Mortgage, LLC (GMACM), Homecomings Financial, Inc. (Homecomings), Residential Accredited Loans, Inc. (RALI), and Residential Funding Company, LLC (RFC) and discovery is pending.

RESERVATION OF RIGHTS

Ms. Smith reserves the right to update, amend or supplement these responses when she receives the responses to her written discovery propounded on November 20, 2015, notwithstanding any interpretation of the Scheduling Order setting a discovery closing date or

the denial of relief from the Scheduling Order should such relief be requested, opposed and denied.

RESPONSES

1. All documents which mention, discuss, describe, relate to, refer to or embody the allegations in the UCL Claim.

RESPONSE TO REQUEST #1:

THIRD AMENDED COMPLAINT

RESPONSE TO THE BORROWERS TRUST OBJECTION

SUPPLEMENTAL PROSPECTUS OF THE RALI SERIES 2007-QO1 TRUST WHICH CONTAINS THE POOLING AND SERVICING AGREEMENT FOR THE RALI SERIES 2007-QO1 TRUST

2. All documents which mention, discuss, describe, relate to, refer to or embody any communications between you and the Debtors concerning your Mortgage Loan or the servicing of your Mortgage Loan.

RESPONSE TO REQUEST #2

MONTHLY MORTGAGE STATEMENTS

THE BORROWER CLAIMS TRUST OBJECTION TO CLAIMANT'S PROOFS OF CLAIM

THE BORROWERS TRUST REPLY TO CLAIMANT'S PROOFS OF CLAIM

3. All documents you sent to the Debtors, including copies of cancelled checks.

RESPONSE TO REQUEST #3:

THIRD AMENDED COMPLAINT

RESPONSE TO THE BORROWERS TRUST OBJECTION (DOC. 7300)

4. All documents you received from the Debtors, including their attorneys.

RESPONSE TO REQUEST #4:

NOTICE OF DEBTORS' CHAPTER 11 BANKRUPTCY

THE BORROWERS TRUST OBJECTION TO CLAIMANT'S PROOFS OF CLAIM (IN OBJECTORS' POSSESSION)

THE BORROWERS TRUST REPLY TO CLAIMANT'S PROOFS OF CLAIM (DOC. 7410)

RESPONSE BRIEF

REQUESTS FOR DISCOVERY

5. All documents which mention, discuss, describe, relate to, refer to or embody all statements, oral or written, from any person involved with, or knowledgeable of, the facts about the circumstances on which this Contested Matter is based.

RESPONSE TO REQUEST #5:

CASE MANAGEMENT CONFERENCE STATEMENTS IN BC465542

CASE MANAGEMENT CONFERENCE STATEMENTS IN BC553608

6. Any and all documents, correspondence, reports and/or memoranda which support your Answer to Interrogatory No. 7.

RESPONSE TO REQUEST #6:

PROMISSORY NOTE ENDORSED IN BLANK

SPECIALLY ENDORSED PROMISSORY NOTE W/ALLONGE

3/18/2008 LETTER FROM AURORA

DEADLY CLEAR BLOG; DEADLYCLEAR.WORDPRESS.COM

The RALI 2007-QO1 Trust's SEC Form 8-K dated 9-27-2007

The RALI 2007-QO1 Trust's SEC Form 10-K dated 12-31-2007

7. Any and all documents, correspondence, reports and/or memoranda which support your Answer to Interrogatory No. 8.

RESPONSE TO REQUEST #7:

PROMISSORY NOTE ENDORSED IN BLANK

SPECIALLY ENDORSED PROMISSORY NOTE W/ALLONGE

THE RALI 2007-QO1 TRUST'S POOLING AND SERVICING AGREEMENT

THE RALI 2007-QO1 TRUST'S SEC FORM 8-K DATED 9-27-2007

THE RALI 2007-QO1 TRUST'S SEC FORM 10-K DATED 12-31-2007

"SMITH SERVICING NOTES"

**MOTION FOR RELIEF FROM STAY FILED BY AURORA, MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS, INC. AND DBTCA**

**WORKOUT AND FORBEARANCE AGREEMENTS ENTERED INTO WITH
AURORA EXHIBITS O-S TAC**

8. Any and all documents, correspondence, reports and/or memoranda which support your Answer to Interrogatory No. 9.

RESPONSE TO REQUEST #8:

PROMISSORY NOTE ENDORSED IN BLANK

SPECIALLY ENDORSED PROMISSORY NOTE W/ALLONGE

THE RALI 2007-QO1 TRUST'S POOLING AND SERVICING AGREEMENT

THE RALI 2007-QO1 TRUST'S SEC FORM 8-K DATED 9-27-2007

THE RALI 2007-QO1 TRUST'S SEC FORM 10-K DATED 12-31-2007

"SMITH SERVICING NOTES"

**MOTION FOR RELIEF FROM STAY FILED BY AURORA, MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS, INC. AND DBTCA**

**WORKOUT AND FORBEARANCE AGREEMENTS ENTERED INTO WITH
AURORA EXHIBITS O-S TAC**

9. Any and all documents, correspondence, reports and/or memoranda which support your Answer to Interrogatory No. 10.

RESPONSE TO REQUEST #9:

PROMISSORY NOTE ENDORSED IN BLANK

SPECIALLY ENDORSED PROMISSORY NOTE W/ALLONGE

THE RALI 2007-QO1 TRUST'S POOLING AND SERVICING AGREEMENT

THE RALI 2007-QO1 TRUST'S SEC FORM 8-K DATED 9-27-2007

THE RALI 2007-QO1 TRUST'S SEC FORM 10-K DATED 12-31-2007

"SMITH SERVICING NOTES"

**MOTION FOR RELIEF FROM STAY FILED BY AURORA, MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS, INC. AND DBTCA**

**WORKOUT AND FORBEARANCE AGREEMENTS ENTERED INTO WITH
AURORA EXHIBITS O-S**

10. Any and all documents, correspondence, reports and/or memoranda which support your Answer to Interrogatory No. 11.

RESPONSE TO REQUEST #10:

NONE

11. Any and all documents, correspondence, reports and/or memoranda which support your Answer to Interrogatory No. 12.

RESPONSE TO REQUEST #11:

NONE at this time, but pending

12. Any and all documents, correspondence, reports and/or memoranda which support your Answer to Interrogatory No. 13.

RESPONSE TO REQUEST #12:

NONE at this time, but pending

13. Any and all documents, correspondence, reports and/or memoranda which support your Answer to Interrogatory No. 14.

RESPONSE TO REQUEST #13:

NONE at this time, but pending

14. Any and all documents, correspondence, reports and/or memoranda which support your Answer to Interrogatory No. 15.

RESPONSE TO REQUEST #14:

Notations made on the March and September Mortgage Statements

15. Any and all documents, correspondence, reports and/or memoranda which support your Answer to Interrogatory No. 16.

RESPONSE TO REQUEST #15:

Notation made on the March and September Mortgage Statements

Third Amended Complaint

16. Any and all documents, correspondence, reports and/or memoranda which support your Answer to Interrogatory No. 17.

RESPONSE TO REQUEST #16:

THIRD AMENDED COMPLAINT

17. Any and all documents, correspondence, reports and/or memoranda which support your answer to interrogatory No. 18.

RESPONSE TO REQUEST #17:

THIRD AMENDED COMPLAINT

18. Any and all documents, correspondence, reports and/or memoranda which support your answer to interrogatory No. 19.

RESPONSE TO REQUEST #18:

THIRD AMENDED COMPLAINT

19. Any and all documents, correspondence, reports and/or memoranda which support your answer to interrogatory No. 20.

RESPONSE TO REQUEST #19:

**NOTATION MADE ON THE FRONT OF THE MARCH MORTGAGE
STATEMENT**

THIRD AMENDED COMPLAINT

20. Any and all expert reports obtained by you with regard to the UCL claim.

RESPONSE TO REQUEST #20:

PENDING

21. Curriculum Vitae for any experts you intend to call at trial for this Contested Matter.

RESPONSE TO REQUEST #21:

PENDING

22. All documents upon which any expert will rely for his or her opinion(s) offered in support of the UCL claim.

RESPONSE TO REQUEST #22:

PENDING

24. All documents that you intend to introduce in evidence at the trial of this Contested Matter.

RESPONSE TO REQUEST #23:

PROMISSORY NOTE ENDORSED IN BLANK

SPECIALLY ENDORSED PROMISSORY NOTE W/ALLONGE

THE RALI 2007-QO1 TRUST'S POOLING AND SERVICING AGREEMENT

THE RALI 2007-QO1 TRUST'S SEC FORM 8-K DATED 9-27-2007

THE RALI 2007-QO1 TRUST'S SEC FORM 10-K DATED 12-31-2007

THE RALI 2007-QO1 TRUST'S SEC FORM 8-K DATED 3-5-2008

"SMITH SERVICING NOTES"

“SMITH BREACH LETTER”

“SMITH OPTIONS LETTER”

CORPORATE ASSIGNMENT OF DEED OF TRUST

**MOTION FOR RELIEF FROM STAY FILED BY AURORA, MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS, INC. AND DBTCA**

25. All documents, correspondence, reports and/or memoranda that support your contention that you were damaged by any action of the debtors alleged in the UCL claim, including, but not limited to, medical records, bank statements, and/or appraisals of the property.

RESPONSE TO REQUEST #25:

11/16/2011: TRUSTEE’S DEED UPON SALE

11/17/2014: JUDGMENT FOR POSSESSION OF PROPERTY

**DECLARATION OF TIA SMITH RE: CLOSURE OF BUSINESS, LOSS OF
INCOME**

MEDICAL/DENTAL EXPENSES

POSTAGE & SHIPPING COST

LITIGATION/SUPPLIES COSTS

MARKET ANALYSES FOR THE SUBJECT PROPERTY

26. All documents, correspondence, reports and/or memoranda that were received by you from the debtors during the servicing of the mortgage loan.

RESPONSE TO REQUEST #26:

WELCOME LETTER

MONTHLY MORTGAGE STATEMENTS

27. Any and all documents, correspondence, reports and/or memoranda demonstrating the Claimant’s financial situation for the period from October 1, 2007 through and including april 1, 2008, including, but not limited to, all of the Claimant’s bank statements, credit card statements, and other account statements from this period.

RESPONSE TO REQUEST #27:

COMERICA BANK STATEMENTS

BANK OF AMERICA BANK STATEMENT

PRUDENTIAL FINANCIAL INSURANCE POLICY

CHASE CREDIT CARD STATEMENTS

SAKS FIFTH AVENUE CREDIT CARD STATEMENT

Dated: December 16, 2015.

/s/ Wendy Alison Nora

Wendy Alison Nora
ACCESS LEGAL SERVICES
310 Fourth Avenue South, Suite 5010
Minneapolis, Minnesota 55415
VOICE (612) 333-4144
FAX (612) 206-3170
accesslegalservices@gmail.com